The Value of Integrated Stormwater Planning

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Overview

- Why We Need Integrated Planning
- USEPA Integrated Planning Framework (IPF)
- Key Elements of an Integrated Plan (IP)
- Experience of other communities
- Making Integrated Planning A Reality in San Diego

Why Integrated Planning (IP)?

Concerns Raised by Mayors:

- Communities faced substantial costs and insufficient funding
- Inflexible USEPA positions on decrees, Long-Term Control Plans
- CSOs, SSOs, stormwater programs, other CWA issues
- Communities wanted to be able to maximize environmental benefit of their CWA actions given limited resources

EPA and State Concerns:

- Slow implementation progress on stormwater and LTCPs
- Weak long term planning, weaker commitments to act

Integrated Planning Framework

EPA's *Integrated Municipal Stormwater and Wastewater Planning Approach Framework* (IPF) issued 2012:

- Plan and sequence water work to focus first on high-return actions
- Schedule work consistent with ability to pay
- Ability to pay should consider ALL Clean Water obligations
- **Not a means to "dumb down" requirements**

Communities have been developing or considering IPs in OH, MA, IN, MD, RI, CO, NH, NY, MO, CA and other States

Overarching Principles of IP

1. Maintain existing regulatory standards
2. Balance requirements to address most pressing issues and pursue most promising solutions first
3. Scope and development of an IP is a municipality's responsibility but needs to work for State
4. Innovative, sustainable technologies encouraged
5. Need solid long term program and financial plan
6. Need real stakeholder involvement throughout process

IPF Development Principles

1. Reflect State requirements/planning efforts; incorporate State input
2. Provide for meeting obligations by utilizing flexibilities in the CWA
3. Analyze various alternatives and sequencing of actions
4. Evaluate and incorporate effective, sustainable tech (e.g., GI)
5. Evaluate and address community impacts and disproportionate burdens
6. Ensure that existing obligations related to technology-based and core requirements are not delayed
7. Ensure that a solid financial strategy is in place
8. Meaningful stakeholder input throughout development

Potential Approach to Addressing IP Elements

1. *Obligations and Costs-* What we need to do, at what cost
2. *Financial Capabilities Assessment-* How much we can afford
3. *Near and Long Term Commitments-* How we will sequence action
4. *Demonstration that Goals will be Achieved-* Why these actions will meet water quality requirements/goals
5. *Prioritized Schedule-* How fast we can go, given financial constraints
6. *Clear Metrics and Process for Adaptation-* How we are accountable
7. *Communication/Stakeholder Process-* How we involve the public

Experience in other communities

- Great interest from *combined sewer system* communities
  - East and Midwest (Philadelphia, DC, Lima, OH, Seattle)
  - Mostly implemented through consent decree revisions
- Most CA interest on *stormwater* side
  - Discussions with Santa Maria, LA cities, Bay Area, ***San Diego***
  - Interest in multi-purpose projects (capture, GI, flood control)
  - Interest in adjusting compliance schedules to implement comprehensive plans, considering financial feasibility
- May be smoother to implement through permits than enforcement
- Framework for selecting higher "bang for buck" projects earlier

Early Integrated Planning Successes

Seattle (2015 Integrated CSO and MS4 plan)

- 3 early action stormwater control projects will *reduce bacteria, metals, TSS, and PCB loads 10-100 times more* than 6 CSO storage projects at same cost and in same time.
- Distributed rain gardens, stormwater collection/treatment facility, and enhanced street sweeping.

Philadelphia's "Green City, Clean Waters" Program

- Moved from storage and treatment solutions to distributed green infrastructure projects (rain gardens, pervious pavement, etc).
- *Built more than 800 acres of GI projects in 5 years*, meeting reduction targets and greening the City at lower cost than conventional controls.

Making IP a Reality in San Diego

- Integrated stormwater planning can fit the IPF model
- San Diego doing a good job assembling the pieces, integrating across water assets and lines of service
- Will need to go beyond existing WQIPs in terms of detail and commitment
- Should offer greater reliability and certainty for all
- Need strong interim milestones and accountability (not a free pass)
- Will require Regional Board assistance:
  - Revise TMDL time schedules in Basin Plan
  - Compliance schedule in NPDES MS4 permit, some other edits to clarify requirements and process to ensure clarity and transparency
  - This takes time and resources but likely worth it
- EPA will be happy to continue assisting this effort